

National Milk Producers Federation

National Milk Producers Federation • 2101 Wilson Blvd., Arlington, VA 22201 • 703-243-6111 FAX 703-841-9328

June 28, 1999

Dockets Management Branch (HFA-305)
Food and Drug Administration
5630 Fishers Lane, Rm. 1061
Rockville, MD 20852

Re: Notice; Agency Information Collection
Activities: Proposed Collection; Comment
Request; Regulations Under the Federal
Import Milk Act. Docket No. 99N-0926.

Dear Sir or Madam:

The National Milk Producers Federation (NMPF) is submitting the following comments to the Food and Drug Administration's (FDA) notice entitled, Agency Information Collection Activities; Regulations Under the Federal Import Milk Act; Proposed Collection; Comment Request (Docket No. 99N-0926). The National Milk Producers Federation, headquartered in Arlington, Va., develops and carries out policies that advance the well-being of U.S. dairy producers and the cooperatives they collectively own. The members of NMPF's 27 cooperatives produce the majority of the U.S. milk supply, making NMPF the voice of 55,000 dairy producers on Capitol Hill and with government agencies.

NMPF considers the protection of public health to be of utmost importance and believes that both domestic and imported dairy products must be adequately protected to ensure the safety of U.S. consumers. Therefore, we offer the following comments on the notice to provide guidance to FDA on behalf of our dairy producer members.

NMPF feels that the regulations under the Federal Import Milk Act and the information obtained are useful for ensuring the safety of milk and milk products in the United States. NMPF also believes that the proposed collection of information is necessary for the proper performance of FDA's functions and that the information will have practical utility.

99N-0926

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Jerome J. Kozak, Chief Executive Officer James P. (Tom) Camerlo, Jr., President Elwood Kirkpatrick, First Vice President
Charles Beckendorf, Second Vice President Robert Dever, Third Vice President
Donald Storhoff, Secretary/Treasurer Clyde Rutherford, Assistant Secretary/Treasurer

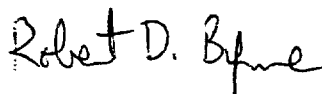
Domestic milk and milk products undergo a high level of regulatory scrutiny before being offered for sale. Current regulations require that milk come from healthy cows and that dairy farms and processing plants be inspected and hold permits. These regulations are enforced at the state level and have FDA oversight throughout the process. NMPF believes that imported dairy products should be subjected to the same level of scrutiny as domestic dairy products. Allowing imported products to enter the U.S. without this level of scrutiny will not only put U.S. dairy producers and processors at an economic disadvantage, it may also place U.S. consumers at risk.

The current requirements of the Federal Import Act require an importer of milk or cream to hold an import milk permit. The permit requires that all cows from which import milk or cream is produced be physically examined and found healthy; if the milk or cream is imported raw, all such cows pass a tuberculin test; the dairy farm and each plant in which the milk or cream is processed or handled be inspected and found to meet certain sanitary requirements; bacterial counts of the milk at the time of importation not exceed specified limits; the temperature of the milk or cream not exceed 50°F; and records of pasteurization be kept. These requirements are consistent with what is required of domestic dairy producers and processors. This type of information is necessary to continue to ensure the safety of dairy products in the U.S. and importers should continue to supply this important information.

In summary, NMPF encourages FDA to continue this information request. Such information is consistent with the agency's function to protect U.S. consumers and will also provide a practical utility in obtaining necessary information to ensure the safety of imported milk and milk products. As global trade in food products continues to increase with each passing year, NMPF believes that it is especially critical at this time to have more information, not less.

Thank you for the opportunity to submit these comments. If you have any questions or need further clarification, please contact me.

Sincerely,

A handwritten signature in black ink that reads "Robert D. Byrne". The signature is written in a cursive, slightly stylized font.

Robert D. Byrne, Ph.D.
Vice President of Regulatory Affairs

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From This portion can be removed for Recipient's records. 8/28/89
Date 8/28/89
Sender's Name Rob Byrne
Phone 703 243-6111
Company NATIONAL MILK PRODUCERS FED
Address 2101 WILSON BLVD STE 400
City ARLINGTON State VA ZIP 22201

Your Internal Billing Reference
To Recipient's Name Dockets Management Branch
Phone 301 827-1223

Company Food and Drug Administration (HFA-305)
Address 5630 Fishers Lane Room 1061
City Rockville State MD ZIP 20852



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Total Weight 3.02
Total Charges

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